

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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NML CAPITAL, LTD.,	:	03 Civ. 8845 (TPG)
	:	05 Civ. 2434 (TPG)
	:	06 Civ. 6466 (TPG)
Plaintiff,	:	07 Civ. 1910 (TPG)
	:	07 Civ. 2690 (TPG)
v.	:	07 Civ. 6563 (TPG)
	:	08 Civ. 2541 (TPG)
THE REPUBLIC OF ARGENTINA,	:	08 Civ. 3302 (TPG)
	:	08 Civ. 6978 (TPG)
Defendant.	:	09 Civ. 1707 (TPG)
	:	09 Civ. 1708 (TPG)
-----	X	
AURELIUS CAPITAL PARTNERS, LP and	:	
AURELIUS CAPITAL MASTER, LTD.,	:	07 Civ. 2715 (TPG)
	:	07 Civ. 11327 (TPG)
Plaintiffs,	:	
	:	
v.	:	
	:	
THE REPUBLIC OF ARGENTINA,	:	
	:	
Defendant.	:	
-----	X	
AURELIUS CAPITAL MASTER, LTD. and	:	
ACP MASTER, LTD.,	:	09 Civ. 8757 (TPG)
	:	09 Civ. 10620 (TPG)
Plaintiffs,	:	
	:	
v.	:	
	:	
THE REPUBLIC OF ARGENTINA,	:	
	:	
Defendant.	:	
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(captions continued on next page)

**THE CITI ENTITIES' NOTICE OF MOTION FOR A STAY**

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AURELIUS OPPORTUNITIES FUND II, LLC	:	
and AURELIUS CAPITAL MASTER, LTD.,	:	10 Civ. 1602 (TPG)
	:	10 Civ. 3507 (TPG)
Plaintiffs,	:	10 Civ. 3970 (TPG)
	:	10 Civ. 8339 (TPG)
v.	:	
	:	
THE REPUBLIC OF ARGENTINA,	:	
	:	
Defendant.	:	
-----	X	
	:	
BLUE ANGEL CAPITAL I LLC,	:	
	:	07 Civ. 2693 (TPG)
Plaintiff,	:	10 Civ. 4101 (TPG)
	:	10 Civ. 4782 (TPG)
v.	:	
	:	
THE REPUBLIC OF ARGENTINA,	:	
	:	
Defendant.	:	
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PLEASE TAKE NOTICE that upon the accompanying Declaration of Rebecca J. Nelson, the accompanying Declaration of Lindsey T. Knapp and all attached exhibits, and the accompanying Memorandum of Law, non-parties Citibank, N.A., Citicorp North America Inc., Citicorp USA Inc., Citigroup Global Markets Inc., and Citigroup Inc. (collectively, the “Citi Entities”) will move this Court, at a date and time to be determined by this Court, to stay further production or proceedings pursuant to the order entered by this Court in the above-captioned actions on September 25, 2013 and the information subpoena dated April 15, 2013 that was served on Citibank, N.A. by counsel for Plaintiff NML Capital, Ltd., and for such other relief as this Court deems just and proper.

Dated: New York, New York  
March 20, 2014

DAVIS POLK & WARDWELL LLP

By: /s/ Karen E. Wagner

Karen E. Wagner

James L. Kerr

Lindsey T. Knapp

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Citicorp North America Inc., Citicorp  
USA Inc., Citigroup Global Markets  
Inc., and Citigroup Inc.*